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March 27, 2002

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Arizona Corporation Commission

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Docket Control  
Arizona Corporation Commission  
1200 West Washington  
Phoenix, Arizona 85007

AZ CORP COMMISSION  
DOCUMENT CONTROL

MAR 28 2002

DOCKETED BY

**Re: Customer Proprietary Network Information (CPNI) Process Investigation,  
Docket No. RT-00000J-02-0066**

Dear Corporation Commissioners and Staff:

With this letter, Citizens Communications ("Citizens") submits its initial comments in the Commission's CPNI Process Investigation, Docket No. RT-00000J-02-0066. Citizens submits these comments on behalf of its three incumbent local exchange carrier ("ILEC") affiliates operating in Arizona: (1) Frontier Citizens Utilities Rural (f/k/a Citizens Utilities Rural Company), T-01954B, (2) Frontier Communications of the White Mountains (f/k/a Citizens Telecommunications Company of the White Mountains), T-03214A and (3) Navajo Communications Company, T-02115A.

Citizens recognizes the need for resolution of the issues raised by the Staff in its February 15, 2002, letter soliciting comments in this docket. Citizens intends to monitor this docket closely and wishes to be included on the service list. The name, address and telephone number of the person upon whom service of all documents should be made are:

Curt Huttzell  
State Government Affairs  
Frontier and Electric Lightwave  
4 Triad Center, Suite 200  
Salt Lake City, Utah 84180  
801-924-6358

Citizens has only two brief comments at this time. First, Citizens believes that an "opt-out" CPNI policy is more practical for ILECs to administer and for the Commission to supervise than an "opt-in" policy. Second, Citizens recommends that the Commission defer to the FCC's CPNI rules in order that a national policy and practice might be applied uniformly in Arizona as well as other states.

Citizens will review and respond to the comments of the parties, as appropriate.

March 27, 2002

If you have any questions or concerns, I can be reached at the above telephone number.

An additional copy of this letter is enclosed. Please stamp this copy received and return it in the enclosed stamped, self-addressed envelope.

Sincerely,

A handwritten signature in cursive script, reading "Curt Huttzell".

Curt Huttzell  
State Government Affairs  
Frontier and Electric Lightwave

cc: Deb Scott

Enclosure